

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA  
Plaintiff

v.

EDWIN SANTIAGO PAGAN  
Defendant

CRIMINAL NO. 99-125 (JAF)

**MOTION TO RELEASE FROM CUSTODY**

TO THE HONORABLE JOSE A. FUSTE  
CHIEF UNITED STATES DISTRICT JUDGE  
FOR THE DISTRICT OF PUERTO RICO

**COMES NOW** Mr. Edwin Santiago Pagán, the defendant herein, represented by the Federal Public Defender for the District of Puerto Rico, and before this Honorable Court respectfully submits the following:

1. On May 9, 2008, U.S. Probation Officer Vélez filed a motion notifying violations of supervised release and requested the issuance of summons.
2. On May 21, 2008 a warrant of arrest was issued by this Honorable Court.
3. Mr. Santiago stated that on June 2, 2008 he was informed by U.S. Probation Officer Vélez of the arrest warrant issued.
4. On June 3, 2008, Mr. Santiago voluntarily surrendered and was ordered detained because there was an arrest warrant issued by this Honorable Court.
5. Mr. Santiago is an independent contractor for the Guánica Municipal Cemetery. His detention for the allegations of supervised release affects his ability to comply with contracts already signed and for his ability to earn a living and provide for his family.

6. Mr. Santiago has complied with the Probation Officer appointments and has maintained communications with Probation Officer since his release. Mr. Santiago poses no risk of flight, therefore he requests to be released on his own recognizance to face all procedures against him.

**WHEREFORE** it is respectfully requested that this Honorable Court grants defendant's petition to be released under the same conditions of supervised release, in the alternative to modify his condition of release to include an electronic monitoring device and to be released on such conditions.

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send electronic notification of such filing to the parties of record.

**RESPECTFULLY SUBMITTED,**

In San Juan, Puerto Rico, this 9<sup>th</sup> day of June 2008.

**JOSEPH C. LAWS, JR.**  
**Federal Public Defender**  
**District of Puerto Rico**

*S/ Coral Rodríguez-Morales*

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